

# EXHIBIT 16

1                   UNITED STATES DISTRICT COURT  
2                   FOR THE SOUTHERN DISTRICT OF NEW YORK  
  
3     GOVERNMENT OF THE UNITED                )  
4     STATES VIRGIN ISLANDS                )  
5                        )  
6     Plaintiff,                        )  
7                        )  
8     vs.                                ) 1:22-cv-10904-JSR  
9                        )  
10    JPMORGAN CHASE BANK, N.A.,        )  
11                        )  
12    Defendant/Third-                )  
13    Party Plaintiff.                )  
  
14                        )  
15    JPMORGAN CHASE BANK, N.A.        )  
16                        )  
17    Third-Party                )  
18    Plaintiff,                )  
19                        )  
20    vs.                                )  
21                        )  
22    JAMES EDWARD STALEY,        )  
23                        )  
24    Third-Party                )  
25    Defendant.                )

FRIDAY, JULY 14, 2023

CONFIDENTIAL - PURSUANT TO PROTECTIVE ORDER

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1 out of law school?

2 A. My first job was as a law clerk  
3 to Judge Harry T. Edwards on the US Court of  
4 Appeals in DC.

5 Q. Did you have another clerkship  
6 after that?

7 A. I did. I clerked for Thurgood  
8 Marshall on the US Supreme Court.

9 Q. Okay. And what did you do  
10 after you clerked for Justice Marshall?

11 A. I joined the law firm of Jones  
12 Day in its New York office.

13 Q. How long were you at -- I'm  
14 sorry, sir.

15 Go ahead.

16 A. It was approximately 18 months.  
17 And I next went to the  
18 US Attorney's Office for the Southern  
19 District of New York. I was an assistant  
20 US Attorney in the criminal division.

21 Q. That's a prosecutor's office?

22 A. Correct. They do civil cases,  
23 too, but I was on the criminal side.

24 Q. And after you left the  
25 US Attorney's Office for the Southern

1       District of New York, what was your next job?

2           A.       I was detailed, as they called  
3           it at the Department of Justice, to main  
4           justice in Washington, DC, and I joined the  
5           Office of the Deputy Attorney General. And I  
6           spent -- that detail lasted for six years. I  
7           was a main justice in the deputy's office.

8           Q.       Did you work directly with the  
9           Attorney General during that time period?

10          A.       There were times when I did,  
11          yes.

12          Q.       Okay. Who was the Attorney  
13          General at that time?

14          A.       Janet Reno.

15          Q.       After you left that role, what  
16          was your next job?

17          A.       My first general counsel job  
18          came then. I became the general counsel of  
19          Napster in, I believe, the spring of 2001.

20          Q.       And how long were you at  
21          Napster?

22          A.       Until the summer of 2002.

23          Q.       Okay. And then did you take  
24          another job after that?

25          A.       I did.

1       recollection of there being a rash of  
2       stories, you know, that did involve Prince  
3       Andrew. Now I see President Clinton at that  
4       time frame. And the sort of flavor of those  
5       tabloid stories, in part, was prominent  
6       people hanging out with somebody like Jeffrey  
7       Epstein who had engaged in bad conduct.

8 So I think that's a long way off  
9 I think saying yes to your question.

10 Q. Thanks.

11                           All right. In the very top  
12 e-mail in TX161, you refer to Jay Lefkowitz,  
13 but then you also say, "Another possible call  
14 is to Willy Ferrer, the US Attorney in  
15 Southern District of Florida. Used to be one  
16 of Reno's special assistants, and very nice  
17 person."

18 Do you see that?

19 A. I see it, yes.

20 Q. Did you ever call Mr. Ferrer?

21                   A.         I don't have a recollection of  
22 speaking to him. I know there's later  
23 e-mails in which I'm reporting that I did,  
24 but I -- even having seen that -- those  
25 e-mails saying I spoke to him, I don't recall

1 speaking to him.

2 Q. Do you believe it's likely that  
3 your connections in the Department of Justice  
4 is one of the reasons that you were asked to  
5 get involved in the Epstein issues at  
6 JPMorgan?

7 MR. GAIL: Objection.

8 THE WITNESS: I don't -- I  
9 don't believe so. I don't have any  
10 specific -- I don't have any  
11 recollection to suggest that that's  
12 the case.

13 QUESTIONS BY MR. WOHLGEMUTH:

14 Q. You don't dispute, though, that  
15 here is an e-mail in which you are referring  
16 to someone that you knew from your time at  
17 the Department of Justice, correct?

18 A. I am doing that in this e-mail,  
19 yes.

20 Q. And Mr. Lefkowitz is -- did you  
21 also know Mr. Lefkowitz from your time in  
22 government?

23 A. No. No, I knew -- I think I  
24 testified earlier I met Jes -- excuse me. I  
25 met Jay Lefkowitz in the 1980s through mutual